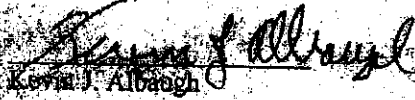


REDACTED – FOR PUBLIC INSPECTION

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed August 7, 2007


Kevin J. Albright

2. I am responsible for the budget and results of capital programs and cost of sales as well as negotiations and vendor management of our service providers, including ILECs, CAPs and CLECs. Additionally, I am involved with the overall business and financial planning of Deltacom. As part of my responsibilities, I have been personally involved in overseeing efforts to implement Deltacom policy to build loop and other facilities where economically possible or to obtain them from non-ILEC providers where available. The purpose of this declaration is to demonstrate the lack of alternatives to ILEC facilities to the vast majority of end-user customer locations.

*Brownworth Declaration
Deltacom, Inc.
WC Docket No. 05-25*

3. Wherever economically possible, Deltacom seeks to rely on its own facilities for provision of service. ITC^Deltacom has invested hundreds of millions of dollars in network facilities including switches, data network, inter-city transport facilities, and OCn transport to ILEC central offices and to other service providers. Deltacom has either built its facilities or acquired them from other carriers. It is my experience that it is never economically feasible for Deltacom to build loops at the DS0, DS1, or DS3 capacity level because, while we offer a diverse array of services in over nine states in the Southeastern US, the revenue (volume and term) opportunities to an individual location are insufficient to justify the costs.

4. Where it is economically infeasible to construct facilities, Deltacom prefers to obtain facilities from competitive providers. Deltacom will purchase services from ILECs in order to meet the ILEC revenue/volume commitments, and the incumbent is the vendor of last resort on DS3 and higher facilities. However, it is my experience in every market in which it operates that Deltacom is never able to obtain raw copper facilities or DS0 level access to any customer location from competitive provider networks. Deltacom is able to obtain DS1 and DS3 level access from competitors to no more than 10% of customer locations.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed August 8, 2007


Steven H. Brownworth

REDACTED -- FOR PUBLIC INSPECTION
ATX, Bridgecom, Broadview, Cavalier, Deltacom, Integra Telecom,
Lightyear, McLeodUSA, RCN, SAVVIS, Telepacific
WC Docket No. 05-25
August 8, 2007

ATTACHMENT 4

COMPARISON OF QWEST PRICING FLEXIBILITY, PRICE CAP AND UNE RATES

Comparison of Qwest Pricing Flexibility, Price Cap, and UNE Rates

Cost of 10-mile Sample Circuit with 2 Channel Terminations
(Rates in Effect 7/13/07)

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Price Cap Rates 1 year term	Price Flex Rates 1 year term	% Difference 1 year term	Price Cap Rates 3 year term	Price Flex Rates 3 year term	% Difference 3 year term
\$382.80	\$551.00	43.9%	\$349.56	\$465.00	33.0%
\$397.70	\$571.00	43.6%	\$365.30	\$485.00	32.8%
\$421.50	\$589.00	39.7%	\$389.40	\$505.00	29.7%
\$3,386.40	\$5,620.00	66.0%	\$3,046.68	\$4,650.00	52.6%
\$3,386.40	\$5,620.00	66.0%	\$3,046.68	\$4,650.00	52.6%
\$3,386.40	\$5,620.00	66.0%	\$3,046.68	\$4,650.00	52.6%

Arizona UNES	Minnesota UNES	Colorado UNES	Iowa UNES	Washington UNES	Average UNES
\$180.17	\$154.93	\$149.33	\$362.13	\$177.34	\$204.78
\$181.11	\$167.11	\$163.29	\$367.77	\$178.44	\$211.54
\$197.51	\$173.73	\$207.89	\$397.79	\$177.78	\$230.94
	\$173.73			\$177.54	\$175.64
				\$188.28	\$188.28
\$1,883.30	\$1,667.79	\$1,541.42	\$2,259.33	\$1,832.77	\$1,836.92
\$1,904.70	\$1,680.09	\$1,649.46	\$2,409.55	\$1,857.81	\$1,900.32
\$2,270.80	\$1,672.09	\$1,994.62	\$3,126.29	\$1,842.65	\$2,181.29
	\$1,878.69			\$1,837.31	\$1,858.00
				\$2,081.55	\$2,081.55

% Diff Price Cap 1 Yr term v. UNE Avg.	% Diff Price Flex 1 Yr term v. UNE Avg.	% Diff Price 3 Yr term v. UNE Avg.
86.93%	169.07%	
88.00%	169.92%	
82.51%	155.04%	
84.35%	205.95%	
78.20%	195.74%	
56.25%	157.65%	

REDACTED – FOR PUBLIC INSPECTION

Comparison of Qwest Pricing Flexibility, Price Cap, and UNE Rates

TARIFF CALCULATIONS AND SOURCES

Qwest DS1 (AZ, CO, IA, & WA):

Channel Term. x 2
Channel Mileage Term. Fixed
Channel Mileage x 10 miles
TOTAL:

1 YEAR					Qwest Tariff	1 YEAR					Qwest Tariff
Price Cap Zones						Price Flex Zones					
1	2	3	4	5	FCC No. 1	1	2	3	4	5	FCC No. 1
\$217.90	\$232.80	\$256.60			Page 7-347	\$312.00	\$332.00	\$350.00			Page 17-91
\$67.90	\$67.90	\$67.90			Page 7-354.2	\$89.00	\$89.00	\$89.00			Page 17-98.2
\$97.00	\$97.00	\$97.00			Page 7-354.2	\$150.00	\$150.00	\$150.00			Page 17-98.2
\$382.80	\$397.70	\$421.50				\$551.00	\$571.00	\$589.00			
\$2,688.00	\$2,688.00	\$2,688.00			Page 7-403	\$4,200.00	\$4,200.00	\$4,200.00			Page 17-122
\$320.10	\$320.10	\$320.10			Page 7-412	\$600.00	\$600.00	\$600.00			Page 17-132
\$378.30	\$378.30	\$378.30			Page 7-412	\$820.00	\$820.00	\$820.00			Page 17-132
\$3,386.40	\$3,386.40	\$3,386.40				\$5,620.00	\$5,620.00	\$5,620.00			
3 YEARS					Qwest Tariff	3 YEARS					Qwest Tariff
Price Cap Zones						Price Flex Zones					
1	2	3	4	5	FCC No. 1	1	2	3	4	5	FCC No. 1
\$205.06	\$220.80	\$244.90			Page 7-347	\$260.00	\$280.00	\$300.00			Page 17-91
\$59.50	\$59.50	\$59.50			Page 7-355	\$85.00	\$85.00	\$85.00			Page 17-99
\$85.00	\$85.00	\$85.00			Page 7-355	\$120.00	\$120.00	\$120.00			Page 17-99
\$349.56	\$365.30	\$389.40				\$465.00	\$485.00	\$505.00			
\$2,398.68	\$2,398.68	\$2,398.68			Page 7-403	\$3,400.00	\$3,400.00	\$3,400.00			Page 17-122
\$297.00	\$297.00	\$297.00			Page 7-416	\$500.00	\$500.00	\$500.00			Page 17-138
\$351.00	\$351.00	\$351.00			Page 7-416	\$750.00	\$750.00	\$750.00			Page 17-138
\$3,046.68	\$3,046.68	\$3,046.68				\$4,650.00	\$4,650.00	\$4,650.00			

Qwest DS1 (AZ, CO, IA, & WA):

Channel Term. x 2
Channel Mileage Term. Fixed
Channel Mileage x 10 miles
TOTAL:

Qwest DS3 (AZ, CO, IA, & WA):

Channel Term. x 2
Channel Mileage Term. Fixed
Channel Mileage x 10 miles
TOTAL:

REDACTED – FOR PUBLIC INSPECTION

Comparison of Qwest Pricing Flexibility, Price Cap, and UNE Rates

Qwest UNE Calculations and Sources

Qwest Arizona				
Zones	1	2	3	
Loops x 2	\$134.78	\$135.72	\$152.12	
IO Transport				
Fixed	\$35.99	\$35.99	\$35.99	
Per-Mile	\$0.9400	\$0.9400	\$0.9400	
Miles	10	10	10	
Totals	\$180.17	\$181.11	\$197.51	

Qwest Colorado			
1	2	3	
\$1,478.14	\$1,499.54	\$1,865.64	
\$246.16	\$246.16	\$246.16	
\$15.9000	\$15.9000	\$15.9000	
10	10	10	
\$1,883.30	\$1,904.70	\$2,270.80	

Qwest Minnesota				
Zones	1	2	3	
Loops x 2	\$54.28	\$66.46	\$73.08	\$91.22
IO Transport				
Fixed	100.65	100.65	100.65	100.65
Per-Mile	0.00	0.00	0.00	0.00
Miles	10	10	10	10
Totals	\$154.93	\$167.11	\$173.73	\$191.87

Qwest Iowa			
1	2	3	
\$1,199.62	\$1,211.92	\$1,203.92	\$1,410.52
87.97	87.97	87.97	87.97
38.02	38.02	38.02	38.02
10	10	10	10
\$1,667.79	\$1,680.09	\$1,672.09	\$1,878.69

Qwest Washington				
Zones	1	2	3	
Loops x 2	\$110.54	\$124.50	\$169.10	
IO Transport				
Fixed	\$26.52	\$26.52	\$26.52	
Per-Mile	\$1.2270	\$1.2270	\$1.2270	
Miles	10	10	10	
Totals	\$149.33	\$163.29	\$207.89	

Qwest Minnesota			
1	2	3	
\$1,216.28	\$1,324.32	\$1,669.48	
\$176.21	\$176.21	\$176.21	
\$14.8928	\$14.8928	\$14.8928	
10	10	10	
\$1,541.42	\$1,649.46	\$1,994.82	

Qwest Washington				
Zones	1	2	3	
Loops x 2	\$171.84	\$177.48	\$207.50	
IO Transport				
Fixed	\$190.29	\$190.29	\$190.29	
Per-Mile	\$0.0000	\$0.0000	\$0.0000	
Miles	10	10	10	
Totals	\$362.13	\$367.77	\$397.79	

Qwest Washington			
1	2	3	
\$1,863.48	\$2,013.70	\$2,730.44	
\$222.65	\$222.65	\$222.65	
\$17.3200	\$17.3200	\$17.3200	
10	10	10	
\$2,259.33	\$2,409.55	\$3,126.29	

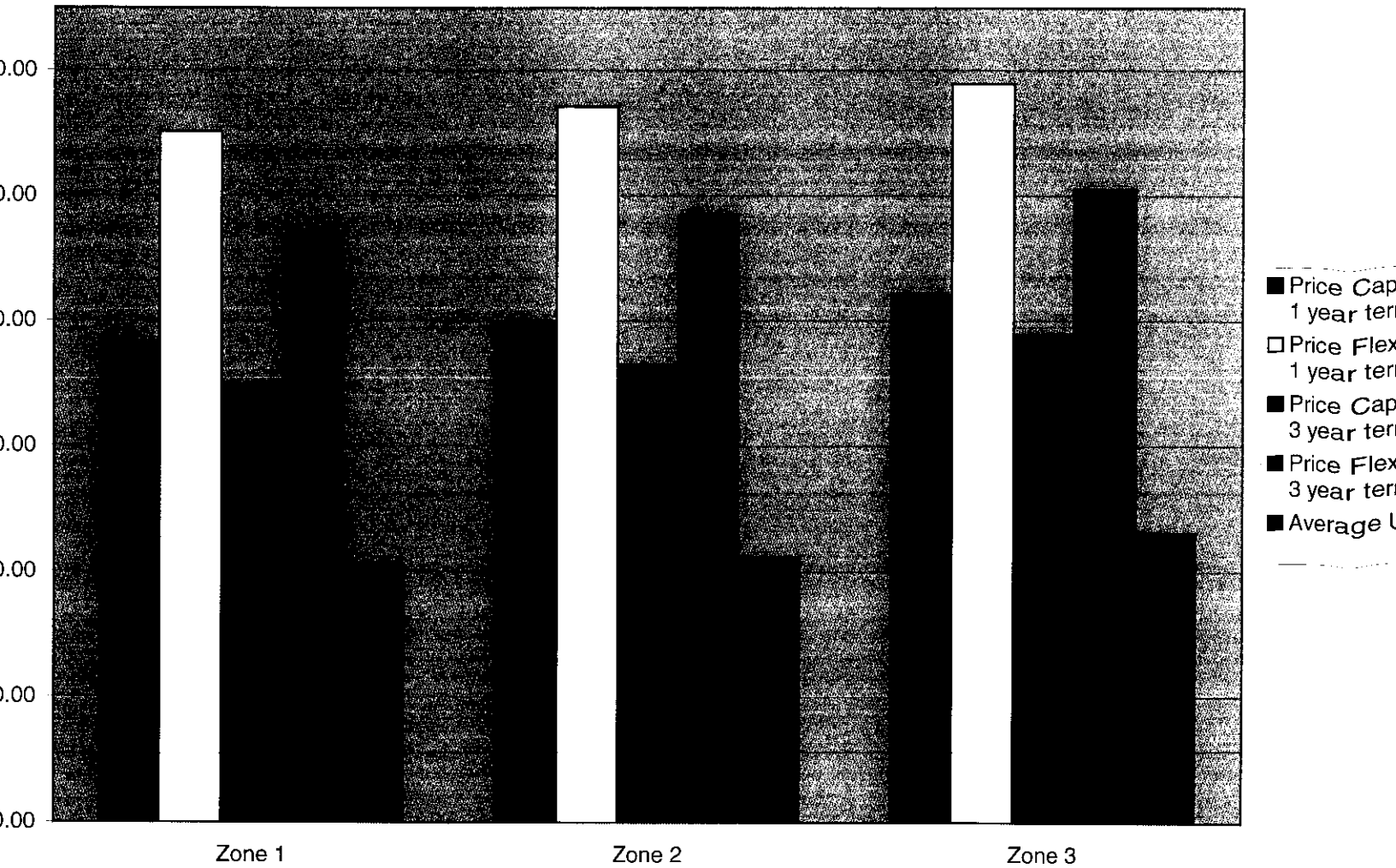
Qwest Washington					
Zones	1	2	3		
Loops x 2	\$137.72	\$138.82	\$138.16	\$137.92	\$148.66
IO Transport					
Fixed	\$33.12	\$33.12	\$33.12	\$33.12	\$33.12
Per-Mile	\$0.6500	\$0.6500	\$0.6500	\$0.6500	\$0.6500
Miles	10	10	10	10	10
Totals	\$177.34	\$178.44	\$177.78	\$177.54	\$188.28

Qwest Washington					
1	2	3			
\$1,491.86	\$1,516.90	\$1,501.74	\$1,496.40	\$1,740.64	
\$225.41	\$225.41	\$225.41	\$225.41	\$225.41	
\$11.5500	\$11.5500	\$11.5500	\$11.5500	\$11.5500	
10	10	10	10	10	10
\$1,832.77	\$1,857.81	\$1,842.65	\$1,837.31	\$2,081.55	

Sources

Qwest-Arizona SGAT, available at http://www.qwest.com/about/policy/sgats/SGATdocs/arizona/AZ_14th_Rev_3rd_Amend_Exh_A_2_10_05_Clean.pdf
 Qwest-Minnesota SGAT, available at http://www.qwest.com/about/policy/sgats/SGATdocs/minnesota/MN_Ex_A_3rd_Rev_5th_Amend_040805_Clean.pdf
 Qwest-Colorado SGAT, available at http://www.qwest.com/about/policy/sgats/SGATdocs/colorado/CO_9th_Rev_2nd_Amended_Exh_A_2_15_05_Clean.pdf
 Qwest-Iowa SGAT, available at http://www.qwest.com/about/policy/sgats/SGATdocs/iowa/iowa_6th_Revised_4th_Amended_Exh_A_2_15_05_Clean.pdf
 Qwest-Washington SGAT, available at http://www.qwest.com/about/policy/sgats/SGATdocs/washington/WA_8th_Rev_9th_Amended_Exh_A_2_15_05_Clean.pdf

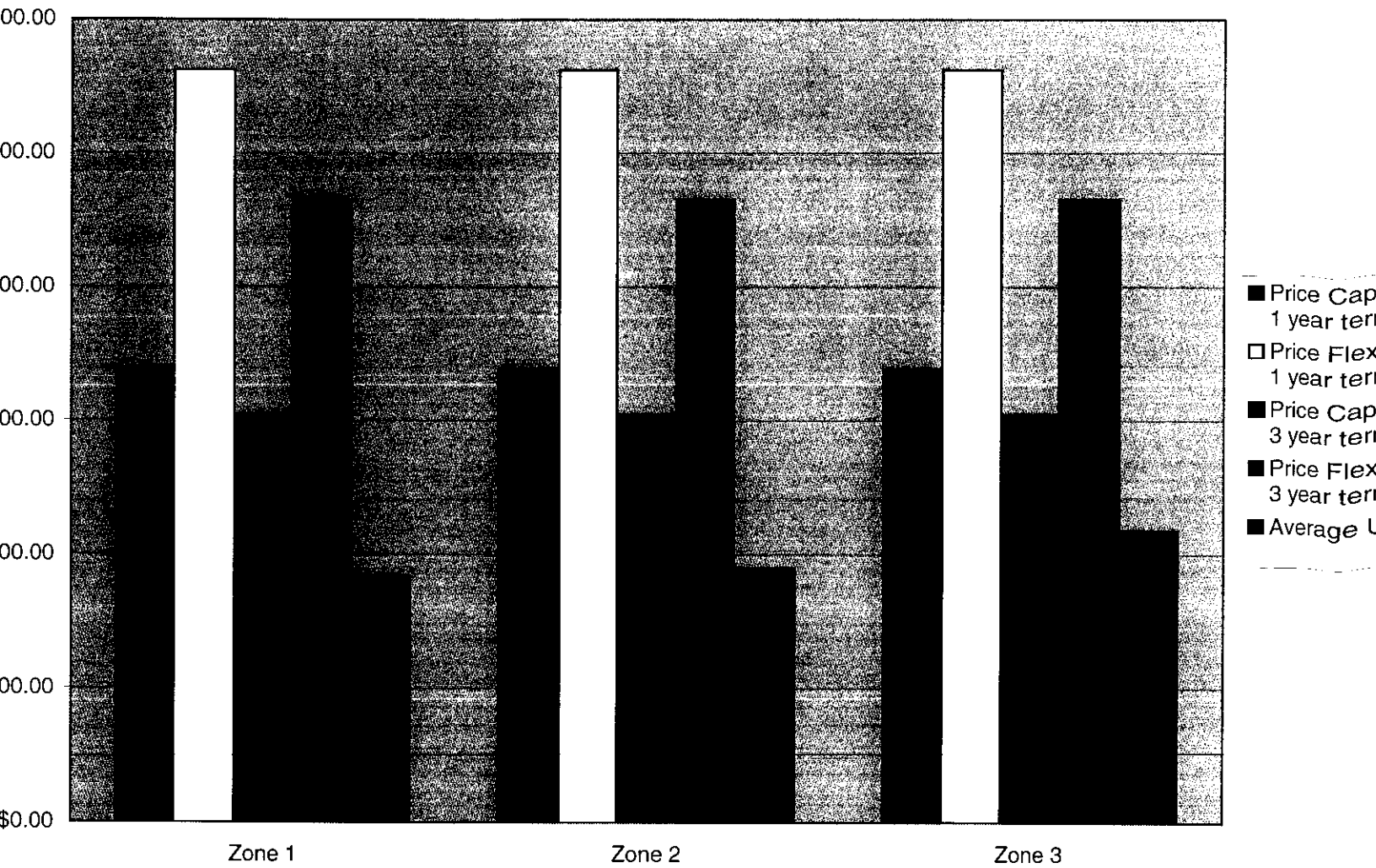
Qwest DS1 Price Cap v. Price Flex v. Avg. UNE
1yr and 3 yr Terms



REDACTED – FOR PUBLIC INSPECTION

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**Qwest DS3 Price Cap v. Price Flex v. Avg. UNE
1yr and 3 yr Terms**



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ATX, Bridgecom, Broadview, Cavalier, Deltacom, Integra Telecom,
Lightyear, McLeodUSA, RCN, SAVVIS, Telepacific
WC Docket No. 05-25
August 8, 2007

ATTACHMENT 5

LIST OF VARIOUS STATE COMMISSION DECISIONS IN THE NORTHEAST
DISCUSSING SECTION 271

Attachment 5
**LIST OF VARIOUS STATE COMMISSION DECISIONS IN THE
 NORTHEAST DISCUSSING SECTION 271**
 Page 1 of 3

District of Columbia	<i>Petition of Verizon Washington, DC Inc. for Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 TAC-19, Recommended Decision, ¶¶ 265-69 (issued Sep. 6, 2005), Commission Order, ¶¶ 90-92, 2005 D.C. PUC LEXIS 257, at *80-83 (D.C. P.S.C. Dec. 15, 2005)</i>
Delaware	<i>In the Matter of the Application of Verizon Delaware, Inc., for Arbitration of an Amendment to Interconnection Agreements with Competitive Local Exchange Carriers and Commercial Mobile Radio Service Providers in Delaware Pursuant to Section 252 of the Communications Act of 1934, as Amended, and the Triennial Review Order (filed February 20, 2004), PSC Doc. No. 04-68, Arbitration Award, ¶ 220 (issued Mar. 24, 2006), aff'd, amended or modified in part and remanded for resolution of remaining issues, Commission Order No. 7144 (Del. P.S.C. Mar. 20, 2007)</i>
Maine	<i>Verizon-Maine Proposed Schedules, Terms, Conditions and Rates for Unbundled Network Elements and Interconnection (PUC 20) and Resold Services (PUC 21), Docket No. 2002-682, Order Part II at 12-15 & 21, 2004 Me. PUC LEXIS 291, at *25-32 & *44-45 (Me. P.U.C. Sep. 3, 2004), Order at 6, 2005 Me. PUC LEXIS 74, at *24 (Me. P.U.C. Mar. 17, 2005), Order at 19-21, 23-24, 30, 33, 38, 40, 43-44, 2005 Me. PUC LEXIS 267, at *46-47, *49-51, *57-58, *72-73, *78-79, *80-81, *90-91, *92-93, *96-97, *103-106 (Me. P.U.C. Sep. 13, 2005); aff'd, Verizon New England Inc. v. Maine Pub. Utils. Comm'n, 441 F. Supp. 2d 147 (D. Me. July 18, 2006), appeal pending, Verizon New England Inc. v. Maine Pub. Utils. Comm'n, No. 06-2151, (1st Cir. filed Jul. 19, 2006)</i>
Massachusetts	<p><i>Complaint of CTC Communications Corp. against Verizon Massachusetts regarding Provisioning of Unbundled Network Elements at Tariffed Rates, D.T.E. 04-87-B, Order on Motions for Reconsideration and Relief of Verizon Massachusetts and Order on Cost Recovery for Non-Tariffed Services, 2007 Mass. PUC LEXIS 1, at *13-14 (Mass. D.T.E. Jan. 17, 2007)</i></p> <p><i>Petition of Verizon New England, Inc. d/b/a Verizon Massachusetts for Arbitration of Interconnection Agreements with Competitive Local Exchange Carriers and Commercial Mobile Radio Service Providers in Massachusetts Pursuant to Section 252 of the Communications Act of 1934, as amended, and the Triennial Review Order, DTE 04-33, Arbitration Order, at 261-62 (Mass. D.T.E. July 14, 2005)</i></p> <p><i>Proceeding by the Department of Telecommunications and Energy on its own Motion to Implement the Requirements of the Federal Communications Commission's Triennial Review Order Regarding Switching for Mass Market Customers; Investigation by the Department of Telecommunications and Energy on its own motion as to the propriety of the rates and charges set forth in the following tariff: M.D.T.E.</i></p>

Attachment 5

**LIST OF VARIOUS STATE COMMISSION DECISIONS IN THE
NORTHEAST DISCUSSING SECTION 271**

Page 2 of 3

	<i>No. 17, filed with the Department on June 23, 2004 to become effective on July 23, 2004 by Verizon New England, Inc. d/b/a Verizon Massachusetts, D.T.E. 03-60/04-73, Consolidated Order Dismissing Triennial Review Order Investigation and Vacating Suspension of Tariff M.D.T.E. No. 17, at 72-73 (Mass. D.T.E. Dec. 14, 2004)</i>
Maryland	<i>In the Matter of the Petition of Verizon Maryland Inc. for Consolidated Arbitration of an Amendment to Interconnection Agreements of Various Competitive Local Exchange Carriers and Commercial Mobile Radio Service Providers Pursuant to Section 252 of the Telecommunications Act of 1996, Case No. 9023, Order No. 80958 at 101, 2006 Md. PSC LEXIS 15, at *153-54 (Md. P.S.C. July 31, 2006)</i>
New Hampshire	<i>See Proposed Revisions to Tariff NHPUC No. 84 (Statement of Generally Available Terms and Conditions); Petition for Declaratory Order re Line Sharing), Docket Nos. DT 03-201 and 04-176 (consolidated), Order No. 24,442, Order Following Brief at 41-50, 2005 N.H. PUC LEXIS 24, at *61-75 (N.H. P.U.C. Mar. 11, 2005) and Verizon New Hampshire Wire Center Investigation, Verizon New Hampshire Revisions to Tariff 84, DT 05-083 and DT 06-012 (consolidated), Order No. 24, 598, Order Classifying Wire Centers and Addressing Related Matters at 46, 2006 N.H. PUC LEXIS 23, at *74 (N.H. P.U.C. Mar. 10, 2006) rev'd in part, Verizon New England, Inc. v. N.H. Pub. Utils. Comm'n, No. 05-CV-94-PB, 2006 U.S. Dist. LEXIS 59339 (D. N.H. 2006), appeal pending, New Hampshire Public Utilities Comm'n v. Verizon New England, Inc., No. 06-2429 (1st Cir. filed Sep. 21, 2006).</i>
New Jersey	<i>Petition of Verizon New Jersey Inc. for Arbitration of an Amendment to Interconnection Agreements with Competitive Local Exchange Carriers in New Jersey Pursuant to Section 252 of the Communications Act Of 1934, as Amended, the Triennial Review Order and the Triennial Review Remand Order, Docket No. TO05050418, Recommended Decision at 85-86 (issued Dec. 1, 2005), Arbitrator's Decision on Exceptions at 25 (issued Jan. 3, 2005), Board Order at 14, 2006 N.J. PUC LEXIS 25, at *35-36 (N.J. B.P.U. Mar. 27, 2006)</i>
Pennsylvania	<i>Petition of Verizon Pennsylvania Inc. and Verizon North Inc. for Arbitration of an Amendment to Interconnection Agreements with Competitive Local Exchange Carriers and Commercial Mobile Radio Service Providers in Pennsylvania Pursuant to Section 252 of the Communications Act of 1934, as Amended, and the Triennial Review Order, P-00042092, Recommended Decision at 124-25 (issued Aug. 31, 2005), Commission Opinion and Order at 150, 2006 Pa. PUC LEXIS 23, at *208 & *423 (Pa. P.U.C. Feb 21, 2006)</i>
Rhode Island	<i>Petition of Verizon-Rhode Island for Arbitration of an Amendment to Interconnection Agreements with Competitive Local Exchange Carriers and Commerical Mobile Radio Service Providers in Rhode Island to Implement the Triennial Review Order and</i>

Attachment 5

**LIST OF VARIOUS STATE COMMISSION DECISIONS IN THE
NORTHEAST DISCUSSING SECTION 271**

Page 3 of 3

	<p><i>Triennial Review Remand Order</i>, Doc. No. 3588, Arbitration Decision, at 6 (issued Nov. 10, 2005), <i>aff'd</i>, Commission Order No. 18522, at 3-7, 2006 R.I. PUC LEXIS 8, at *4-12 (R.I. Feb. 1, 2006)</p> <p><i>Verizon-Rhode Island's Filing of February 18, 2005 to Amend Tariff No. 18</i>, Doc. No. 3662, Order No. 18310, at 9-10, 2005 R.I. PUC LEXIS 26, at *15-16 (R.I. P.U.C. July 28, 2005)</p>
Vermont	<p><i>Petition of Verizon New England, Inc., d/b/a/ Verizon Vermont, for Arbitration of an Amendment to Interconnection Agreements with Competitive Local Exchange Carriers and Commercial Mobile Radio Service Providers in Vermont, Pursuant to Section 252 of the Communications Act, as amended, and the Triennial Review Order</i>, Docket 6932, at 264, 2006 Vt. PUC LEXIS 27, at *511-512 (VT P.S.B. Feb. 27, 2006)</p>